

December 17, 2019

VIA ECF/CM

Judge Andrew L. Carter, Jr.  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC#:  
DATE FILED: 1-2-20

Re: *United States v. David Taylor*  
17 Cr. 390 (S.D.N.Y.) (ALC)

Dear Judge Carter:

I represent David Taylor in the above-captioned matter, having been appointed following the death of his trial counsel about three months after the end of trial. I write to ask that this Court grant a short adjournment of the sentencing that is currently scheduled for January 16, 2020 at 10 am in order to allow me to incorporate the findings of the neuropsychologist in the defense sentencing submission. This is the fourth request for a sentencing adjournment. The government does not object to this request.

In light of David Taylor's comportment at court appearances, meetings and during his pretrial investigation report interview (as reported by the probation officer), this Court granted a defense motion for a neuropsychology expert. Because of the deterioration in my client's health and cognitive function, over the course of the summer he was moved from the Metropolitan Correctional Center to various hospitals and, ultimately, a nursing home in the Bronx. After obtaining the final set of medical records, the expert scheduled testing with David Taylor, which required coordination among the expert, defense counsel, the United States Marshals Service (USMS), which is responsible for David Taylor's custody upon his departure from the MCC, and the private security service with which the USMS contracted to provide 24-hour guards at the Bronx nursing home. The expert was not able to complete testing until November 18, 2019 and because of both the work required in scoring any analyzing the tests and commitments to other cases and clients, the expert has not yet provided me with the test results. She expects to have them by the end of December.

To effectively prepare David Taylor's sentencing submission, I need an opportunity to review and incorporate any relevant findings and information in the neuropsychologist's report. However, I will be out of town with limited access to a computer and the internet from December 24 until January 5.

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I therefore respectfully ask that this Court adjourn sentencing in this matter for about two weeks, until sometime on or after January 30, 2020.

Respectfully,

/s/  
Megan W. Bennett

cc: All counsel of record by ECF

Application granted. Sentencing adjourned  
to 2-5-20 at 10:30 a.m.

So Ordered.  
  
1-2-20